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May 12, 2020

Via ECF

The Honorable Noel L. Hillman, U.S.D.J. Mitchell H. Cohen Federal Courthouse One John F. Gerry Plaza Fourth & Cooper Streets Camden, New Jersey 08101

Re: <u>Ingram v. County of Camden, et al.</u> Civil Docket No.: 1:14-cv-05519 (NLH)(KMW)

Dear Judge Hillman:

This office represents Defendants County of Camden, Camden County Police Department, Chief John Scott Thomson, and Nicholas Marchiafava ("Moving Defendants") in the above captioned matter.

Please accept this correspondence in lieu of a more formal application by Moving Defendants to join in the following Motions in Limine filed by Defendants Jeremy Merck ("Merck") and Antonio Gennetta ("Gennetta"):

- Motion <u>in Limine</u> to Preclude Certain Opinions and Testimony of Dr. William Matuozzi (ECF No. 284), filed by Merck on May 6, 2020;
- Motion <u>in Limine</u> to Preclude Evidence, Testimony and Argument Regarding the Internal Affairs, Employment and Personnel History of the Officer-Defendants (ECF No. 286), filed by Merck on May 8, 2020;
- Motion <u>in Limine</u> to Preclude Certain Demonstrative Aids Produced by Plaintiff (ECF. No. 287), filed by Merck on May 8, 2020;
- Motion in Limine for Relief on behalf of Defendant, Antonio Gennetta (ECF No. 290), filed by Gennetta on May 8, 2020.

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Moving Defendants join in the aforementioned Motions <u>in Limine</u> for the reasons set forth by Merck and Gennetta in their respective Motions.

We thank the Court for its time and attention to this matter.

Respectfully submitted, **BROWN & CONNERY, LLP**

/s / William F. Cook

William F. Cook

WFC/ASB

cc: Counsel of Record (via electronic filing only)